

AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.

ATTORNEYS AT LAW

ORIGINAL

DALLAS, TEXAS
AUSTIN, TEXAS
SAN ANTONIO, TEXAS
HOUSTON, TEXAS
NEW YORK, NEW YORK

A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS
1333 NEW HAMPSHIRE AVENUE, N.W.
SUITE 400
WASHINGTON, D.C. 20036
(202) 887-4000
FAX (202) 887-4288

BRUSSELS, BELGIUM
MOSCOW, RUSSIA

WRITER'S DIRECT DIAL NUMBER (202) 887-4011

September 8, 1995

RECEIVED

SEP 8 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

Re: Errata
CC Docket No. 92-297

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Enclosed for filing are an original and nine copies of page ii of the Summary of Comments filed by Teledesic Corporation on September 7, 1995 in the above-captioned proceeding. Due to a clerical error, one of the subpoints on page ii of the Summary was listed under the incorrect heading in the original filing. The enclosed page ii of the Summary corrects this inadvertent error. We respectfully request that the attached page ii of the Summary be substituted for page ii of the Summary filed on September 7, 1995.

Correspondence or inquiries concerning this matter should be referred to the undersigned.

Very truly yours,

Tom W. Davidson

Tom W. Davidson, P.C.

Enclosure

No. of Copies rec'd
US1A B C D E

029

- o The proposed 28 GHz band segmentation plan redesignates 1000 MHz of spectrum for LMDS and provides LMDS proponents with precisely the spectrum they claim to need to operate a competitive LMDS system.
 - The Commission should adopt a local priority designation for LMDS in the United States in that portion of the 28 GHz band proposed for LMDS.
 - A local priority designation tracks the approach being advanced internationally.
- o Teledesic supports the designation in the 28 GHz band of 1000 MHz of spectrum on a primary (28.35 - 28.60 GHz and 29.5 - 30.0 GHz) or co-primary (29.25 - 29.5 GHz) basis for GSO satellite systems. Such a band plan will meet the requirements for Hughes' proposed Spaceway system and will be sufficient to accommodate several other GSO satellite systems.
 - In order to preserve the availability of the 27.50 - 28.35 GHz band on a secondary basis for gigalink terminals and gateways for NGSO satellite systems like Teledesic, the 19.300 - 19.425 and 19.575 - 19.700 GHz downlink bands should be paired with GSO uses at the 29.25 - 29.50 GHz uplink band.
- o For both GSO and NGSO satellite systems to be accommodated in the Ka band, band segmentation is required.
 - As the Commission recognizes, attempting to accommodate GSO satellite systems and NGSO satellite systems in the same frequency bands is highly problematic.
 - The existing GSO satellite regulatory regime can be left in place in portions of the Ka band where GSO satellite systems will be accorded primary status with a separate portion of the Ka band designated on a primary basis for NGSO satellite systems.
 - In the portion of the Ka band designated on a primary basis for NGSO satellite systems, a separate set of service rules should be adopted to address the distinct characteristics of such systems.
- o For both LMDS and satellite systems to be accommodated in the Ka band, band segmentation is required because co-frequency sharing in the 28 GHz band between service links for satellite systems and the proposed LMDS is not feasible.
- o Teledesic supports designation of the 28.6 GHz and 18.8 - 19.3 GHz bands for service links for NGSO satellite systems

CERTIFICATE OF SERVICE

I, Dayle L. Jones, an employee of Akin, Gump, Strauss, Hauer & Feld, L.L.P., certify that copies of the foregoing **ERRATA TO COMMENTS OF TELEDESIC CORPORATION** were sent via Hand Delivery on this 8th day of September, 1995, to the following parties:

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, NW
Room 814
Washington, D.C. 20554

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, NW
Room 802
Washington, DC 20554

Commissioner Andrew C. Barrett
Federal Communications Commission
1919 M Street, NW
Room 826
Washington, DC 20554

Commissioner Susan P. Ness
Federal Communications Commission
1919 M Street, NW
Room 832
Washington, DC 20554

Commissioner Rachelle Chong
Federal Communications Commission
1919 M Street, NW
Room 844
Washington, DC 20554

Blair Levin, Esq.
Office of Chairman Hundt
Federal Communications Commission
1919 M Street, NW
Room 814
Washington, DC 20554

Lauren J. Belvin, Esq.
Office of Commissioner Quello
Federal Communications Commission
1919 M Street, NW
Room 802
Washington, DC 20554

Rudolfo M. Baca, Esq.
Office of Commissioner Quello
Federal Communications Commission
1919 M Street, NW
Room 802
Washington, D.C. 20554

Lisa B. Smith, Esq.
Office of Commissioner Barrett
Federal Communications Commission
1919 M Street, NW
Room 826
Washington, DC 20554

Ruth Milkman
Senior Legal Advisor
Office of Chairman Hundt
Federal Communications Commission
1919 M Street, NW
Room 814
Washington, DC 20554

Ms. Jill Luckett
Office of Commissioner Chong
Federal Communications Commission
1919 M Street, NW
Room 844
Washington, DC 20554

Jane Mago, Esq.
Office of Commissioner Chong
Federal Communications Commission
1919 M Street, NW
Room 844
Washington, DC 20554

Mary McManus, Esq.
Office of Commissioner Ness
Federal Communications Commission
1919 M Street, NW
Room 832
Washington, DC 20554

David R. Siddall, Esq.
Office of Commissioner Ness
Federal Communications Commission
1919 M Street, NW
Room 832
Washington, DC 20554

James L. Casserly, Esq.
Office of Commissioner Ness
Federal Communications Commission
1919 M Street, NW
Room 832
Washington, DC 20554

Dr. Robert M. Pepper
Chief
Office of Plans & Policy
Federal Communications Commission
1919 M Street, NW
Room 822
Washington, DC 20554

Donald H. Gips
Deputy Chief
Office of Plans & Policy
Federal Communications Commission
1919 M Street, NW
Room 822
Washington, DC 20554

Gregory Rosston
Office of Plans & Policy
Federal Communications Commission
1919 M Street, NW
Room 822
Washington, DC 20554

Ms. Amy Lesch
Office of Plans & Policy
Federal Communications Commission
1919 M Street, NW
Room 822
Washington, DC 20554

Regina Keeney, Esq.
Chief Wireless Telecom. Bureau
Federal Communications Commission
2025 M Street, NW
Room 5002
Washington, DC 20554

Laurence Atlas, Esq.
Legal Advisor to the Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW
Room 5002-E
Washington, DC 20554

Mr. Robert James
Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW
Room 8010-B
Washington, DC 20554

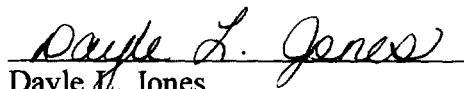
Scott Blake Harris, Esq.
Bureau Chief
International Bureau
Federal Communications Commission
2000 M Street, NW
Suite 800
Washington, DC 20554

Jennifer Gilsenan, Esq.
Satellite Policy Branch
International Bureau
Federal Communications Commission
2000 M Street, NW
Room 590
Washington, DC 20554

Susan Magnotti, Esq.
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW
Room 6008
Washington, DC 20554

Donna L. Bethea
Satellite Engineering Branch
International Bureau
Federal Communications Commission
2000 M Street, NW
Room 590
Washington, DC 20554

Tom Tycz
Division Chief
Satellite & Radiocommunications Div.
Federal Communications Commission
International Bureau
2000 M Street, NW
Suite 800
Washington, DC 20554


Dayle L. Jones